

Anti-Dumping Transition Review Questionnaire (UK Producer)

Case TD0034: steel ropes and cables exported from the People's Republic of China (including steel ropes and cables consigned from Morocco and the Republic of Korea)

Period of Investigation (POI):	1 January 2022 to 31 December 2022
Injury period (IP):	1 January 2019 to 31 December 2022
Deadline for response:	12 June 2023
Contact details:	TD0034@traderemedies.gov.uk
Completed on behalf of:	<i>Bridon International Limited</i>

When you have completed this form, indicate the **confidentiality status** of this document by placing an X in the relevant box below:

Non-Confidential – will be made publicly available

Your completed response must comprise this questionnaire and the corresponding annex. Please note that you will have to provide a **Confidential** and a **Non-Confidential** version of both the questionnaire and annex, as well as any additional documents you append. All documents should be uploaded to the Trade Remedies Service (www.trade-remedies.service.gov.uk) by 12 June 2023.

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Introduction

About us, this case and this questionnaire

The Trade Remedies Authority (TRA) investigates whether trade remedies are needed to prevent injury to UK industry. The TRA has been established to provide the UK with its own independent trade remedies system.

As part of our work, we are carrying out a transition review of each trade remedy measure active under the EU system that the United Kingdom (UK) has decided to maintain after EU exit.

This transition review will consider whether dumping of **Steel Ropes and Cables** originating in the **People's Republic of China (including steel ropes and cables consigned from Morocco and the Republic of Korea)** and injury to the UK industry would be likely to continue or recur if the anti-dumping amount currently applicable were no longer applied to those goods.

Why should I take part?

We are asking domestic producers of steel ropes and cables to complete this questionnaire to inform our review of whether the current anti-dumping measure should be varied or revoked.

The information your company provides will help us to reach a fair and proportionate decision.

How do I respond?

Detailed guidance on how to complete the questionnaire is provided in the [instructions](#) section below.

Please provide all the information requested by **12 June 2023**. We may need to issue a deficiency notice if we determine that the information supplied in the questionnaire is incomplete or inadequate. We may also send a notice requesting clarification or supplementary information if necessary. Therefore, please provide as much detail as possible in your responses.

Where can I find more information?

Our [trade remedies guidance](#) provides general information about our investigations and processes we follow.

If you have any specific questions relating to the case, now or while you're completing the questionnaire, please contact the Case Team at TD0034@traderemedies.gov.uk.

You can also find out more about the regulatory basis of our investigations. The TRA investigates cases under the provisions of *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019 (as amended)* and under the *Taxation (Cross-border Trade) Act 2018*.

Instructions on completing this questionnaire

Preparing your response

This section sets out guidance on how to complete this questionnaire.

If you think you won't be able to complete the questionnaire within the required time, please contact the Case Team ahead of the deadline using the contact details on the cover of this questionnaire. You should outline the length of extension you need and the reasons why. We will notify you of our decision.

If we can accommodate an extension, we will publish a note on our [public file](#) to record both the request and the extension granted.

How to answer the questions

Please read and follow all the instructions carefully. Your company will need to substantiate all claims with relevant data and information. You may be asked to attach supporting documents in appendices to supplement your responses. To help us verify your information, please retain all these documents, your completed spreadsheet annexes and any calculations you made when developing your responses.

Please also note the following points:

- Do not leave any questions blank. If the question is not relevant to your organisation, please explain why. If the answer to a question is "zero", "no" or "none", please write this.
- Please complete the spreadsheet annexes as requested. Annexes are named to correspond to the relevant sections of this questionnaire and must be completed with reference to the instructions provided. If you feel you cannot present the information as requested, please contact your Case Team as soon as possible.
- Please provide all formulas and calculations used within your questionnaire response.
- If there is insufficient space in any part of the questionnaire to provide the details requested, or we ask for copies of additional information, please submit this

information as appendices. Please ensure that any attachments are given a corresponding appendix reference in the title of the document and that these are referenced in the boxes provided.

- Any documents not in English should be accompanied by an English translation.
- Please provide all dates in the format DD/MM/YYYY (e.g. 23/05/2022).
- Unless otherwise stated, 'year' or 'calendar year' refers to the period 1 January – 31 December and 'quarter' refers to the associated three-month periods (1 January – 31 March, 1 April – 30 June, etc).
- Identify all units of measurement and currencies used in tables, calculations and lists, if not provided by the corresponding instructions, and use units of measurement consistently (e.g. do not use kg and metric tonnes interchangeably).
- For all numerical figures, where appropriate please express every third number with a comma (e.g. '1,300' for one-thousand three hundred, '1,300,000' for one million and three-hundred thousand).
- Please limit all sales / currency / income figures to two decimal places, apply a full point as a decimal separator and use the appropriate currency symbol or abbreviation (e.g. £1,300.00).
- Provide all costing figures as actual amounts. Where actual amounts cannot be provided and you have reported standard costing instead, please indicate this in the relevant answer, and explain the variance from actual costs, if any.
- All figures should be reported net of tax unless otherwise stated.
- Please refer to the case number, **TD0034**, in any correspondence with the TRA.

Preparing confidential and non-confidential versions

You will need to submit one confidential version and one non-confidential version of your questionnaire and the corresponding spreadsheet annex by the due date. This is so that we can publish the non-confidential version of your information on our public file. **Please ensure that each page of information you provide is clearly marked either “Confidential” or “Non-Confidential” in the header.**

Please see our guidance on [how to submit information](#) for further details on what can be considered confidential and how to prepare a non-confidential version of this questionnaire.

In preparing your response, please note the following:

- It is your responsibility to ensure that the non-confidential version does not contain any confidential information.
- Remember to include a statement explaining why information obtained in your response should be treated as confidential (e.g., the data is commercially sensitive).
- Provide the source for all information or data you don't own and clearly state any restrictions on sharing it.

- If you do not provide a non-confidential summary (or a statement of reasons why you cannot provide this) each time you provide confidential information, the TRA may disregard the information you give us.

All information provided to the TRA in confidence will be treated accordingly and only used for this investigation (except in limited circumstance as permitted by regulation 46 of the *Trade Remedies (Dumping and Subsidisation) (EU Exit) Regulations 2019*) and will be stored in protected systems. The non-confidential version of your submission will be placed on the public file, which is available on www.trade-remedies.service.gov.uk/public/cases.

Providing information from subsidiaries or associated parties

Section A of this questionnaire includes detailed questions about your company structure. Although this questionnaire is intended for your company, our investigation covers all subsidiaries and any other associated companies involved in the import, production, sale, R&D, distribution and / or supply of the like good and/or goods subject to review.

Please note, both natural persons (individuals) and legal persons (e.g. companies) are considered to be associated where they meet the definition of 'Related Persons' in [Regulation 128 of the Customs \(Import Duty\) \(EU Exit\) Regulations 2018](#):

- If any of your subsidiaries or associated companies are also a UK producer of like goods, they should **also** complete a Producer questionnaire. Please make sure you provide your subsidiaries with access to it.
- Where your subsidiaries or associated companies are not producers but are involved in the sales of the like goods, your questionnaire response should include information from those companies.

If you have any queries about this part of the process, please contact the Case Team using the details provided on the cover of this questionnaire.

What happens next

Once you have completed your questionnaire responses including the corresponding annex(es) and any additional documents requested, you must upload confidential and non-confidential versions through our [Trade Remedies Service](#). Following this:

- You will receive an email confirming the documents have been uploaded successfully.
- The case team will contact you if further information is required.
- The non-confidential responses will be placed on the public file.

- The case team may contact you to arrange a visit to verify the information contained in your responses.

Verifying the information you supply

The TRA will verify, as far as possible, the information provided to it. As part of this process, we may conduct verification visits. If we need to verify information that you provide by visiting your premises, the case team will contact you to arrange this.

Visits can last several days, during which we will want to speak to management and staff to help establish the completeness, relevance and accuracy of the information provided.

Please keep a record of formulas and steps used in your calculations and other related material / documentation as it may be asked for during verification. In some circumstances verification visits may be conducted remotely.

Please indicate any dates when you would be unable to host a verification visit, from August – October 2023.

<i>Will be available in the time period August – October 2023</i>

Appendix reference:

Once verification is complete, the TRA will prepare a report and share a draft with you. The TRA will then ask you to prepare a non-confidential copy of the report for the public record. If you feel some information in the report should be kept confidential, please provide your reasons for this.

The scope of this review

Goods subject to review

This review covers **steel ropes and cables** exported from **the People's Republic of China including consignments from, whether or not declared as originating in, Morocco or the Republic of Korea** described as:

- ***Steel ropes and cables including locked coil ropes, excluding ropes and cables of stainless steel, with a maximum cross-sectional dimension exceeding 3mm;***

These **steel ropes and cables** are currently classifiable within the following commodity code(s):

73 12 10 81 12	73 12 10 81 13	73 12 10 81 19
73 12 10 83 12	73 12 10 83 13	73 12 10 83 19
73 12 10 85 12	73 12 10 85 13	73 12 10 85 19
73 12 10 89 12	73 12 10 89 13	73 12 10 89 19
73 12 10 98 12	73 12 10 98 13	73 12 10 98 19

These commodity codes are only given for information.

In this questionnaire, these goods will be referred to as **'the goods subject to review'**. Any reference to 'goods subject to review' in this questionnaire refers to the goods description above, regardless of the commodity code under which they are exported.

Like goods

Any reference to **'like goods'** in this questionnaire refers to goods which are like the goods subject to review in all respects, or with characteristics closely resembling them and which are sold on the domestic market of the People's Republic of China, Morocco, the Republic of Korea, the UK market or to third countries.

Please follow the instructions for each question to provide the appropriate information regarding the like goods or goods subject to review.

Product Control Numbers

The TRA uses Product Control Numbers (PCNs) to define and distinguish the different types of products that fall under the goods description above.

PCNs, which come in the form of an alphanumeric code, help to create a categorisation system so that comparisons can be made between goods produced in the domestic UK market and those produced in foreign markets.

In this questionnaire and the corresponding annexes, you will be asked to construct PCNs representing the different types of products you produce. When giving your PCNs, please do not use any spaces, dashes or other means of separation, and ensure you follow the order of characteristics outlined in the table above.

The PCN table is set out on the page below.

Field description	Field format	Explanation
Number of strands	06 08 18 24 26 31 34 44	Indicate the number of strands e.g. a rope made of 6 strands, would be codified as 06
Number of wires per strand	07 17 19 24 25 26 29 31 36 37 41 43 47 49 52	Indicate the number of wires per strand, e.g. a strand made of 19 wires, would be codified as 19.
Wire characteristics/ Finishing	1 2 3 4 = Bezinal 5 = Galfan	Indicate whether the wires of the rope are : 1 = Galvanised (normal galvanisation) 2 = Galvanised (heavy galvanisation) 3 = Bright (not coated) 4, 5, 6 ... = Otherwise coated (please specify the other type of "coating" in a separate note)
Core	1 2 3 4 = EPIWRC 5 = EPWSC	Indicate the type of core in the rope 1=FC – Fibre Core 2=IWRC–Independent Wire Rope Core (or IWR) 3=WSC – Wire Strand Core (or INS)

	6 = Synthetic Core 7 = Solid Polymer Core 8 = Parallel Rope Core	4=Other (please specify)
Type of rope	A B C D E F I G = SWS H = Triangle	Indicate the type of rope, according to accepted industry standards A = Standard B = Seal C = Warrington D = Warrington Seal E = Filler F = Rotation resistant G = Combination (please specify the components in a separate note) H = Cable laid I = Compacted J, K, L, M ... = others (please specify)
Wire	C	Indicate the material of the wire A=Iron (0.01% to 0.1% carbon content) B=Low carbon steel (0.11% to 0.35% carbon content) C= High carbon steel (> 0.35% carbon content)
Wire "Tensile strength"	1 2 3 4 5 6 8	Indicate the "Tensile strength" of the wire component of the rope, in Newton per mm ² selecting one of the following categories: 1 = 1370 to 1569 5 = 2150 to 2300 2 = 1570 to 1769 6 = > 2300 3 = 1770 to 1899 7 = < 1370 4 = 1900 to 2146 8 = dual tensile strength
Rope cover	A B C = Part Covered	Indicate whether the rope is covered or not : A = not covered B = plastic covered C,D,E = otherwise covered/coated (please specify)
Diameter of rope	10 mm to 160 mm	Indicate the diameter of the rope in millimetres, e.g. 16.5 mm = 017 ; 20 mm = 020
End Finishes	A C D E F G = Welded H = Pulling Eyes I = End Stops	Indicate End Finishes A = Socketing B = Stamping C = Fuse and Tapering D = Cold Pressed Ferrels E = Soft Eye Splice F = Seized End

		G,H,I other finishes please specify
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An example of what a PCN could look like is: **161912AB6B21E**

1. Do you agree with the scope of this review?

Yes

If you have answered no to the above question, please explain why.

Please answer here

Appendix reference:

2. Please provide details of any technical or physical characteristic not included in the PCN structure that may affect the price comparison between products.

Lubrication – we manufacture ropes with varying levels of lubrication and also used very specialised lubricants which are environmentally friendly, have wide temperature ranges or are suitable for ropes operating at over 2000 metre sea depths

Appendix reference:

3. Please comment on the suitability of the PCN structure in regard to your product range. This may include areas such as:

- categorisation of features;
- number of products included under the end range thickness categories, which may prevent a fair comparison; and
- specialised products which may unduly influence the comparison.

The proposed structure is suitable

Appendix reference:

4. Please provide details of any manufacturing process differences which you feel may influence the PCN structure and the price comparison between the goods subject to review and the like goods.

N/a

Appendix reference:

SECTION A: Company structure and operations

A1 Identity and contact details

1. Please complete the table below, ensuring that the contact given has the authority to provide this information:

Legal name of company:	Bridon International Limited
Legal structure (limited company, sole trader, partnership etc.):	Limited company
Year of establishment:	1946
Other operating names:	n/a
Company registration number:	416671
Place of registration:	London, UK
Name (point of contact):	
Position:	
Address:	Technology Centre, Balby Carr Bank, Doncaster DN4 8DG
Telephone No:	
Email:	
Website:	Bridon-bekaert.com

2. If you have appointed an external party to act on your behalf in this review, please provide their details and attach a letter confirming the TRA should contact them directly:

Name:	n/a
Address:	
Telephone No.:	
Email:	
Confirm they have signed authority to act (Yes / No):	
	Appendix reference:

A2 About your company

1. Describe the role of your company in the UK market for the like goods (e.g., producer, producer / exporter, producer / importer or producer / distributor).

Producer and exporter

Appendix reference:

2. Please provide details of any changes in the legal form of your business over the past 5 years, for example, mergers, acquisitions and / or sales.

Date	Legal form	Explanation of change
n/a		

+Add additional rows as required.

3. List and explain all authorisations your company has been required to obtain to produce, sell, or to export the like goods. These may include licences, permits, permissions or mining concessions. Indicate if your company is subject to any direct or indirect, quantitative, or other, restrictions on any of these activities.

n/a

Appendix reference:

4. List all international production standards (BS / EN etc.) your company currently conforms to, for the like good.

BS EN 12385 Parts 1-10, ISO 2408, API 9A

Appendix reference:

5. Please describe all the other products (not including the like goods) produced or sold by your company in the UK.

Spiral Strand Ropes and Triangular Strand Ropes as they are stainless steel and not in scope; wire products

Appendix reference:

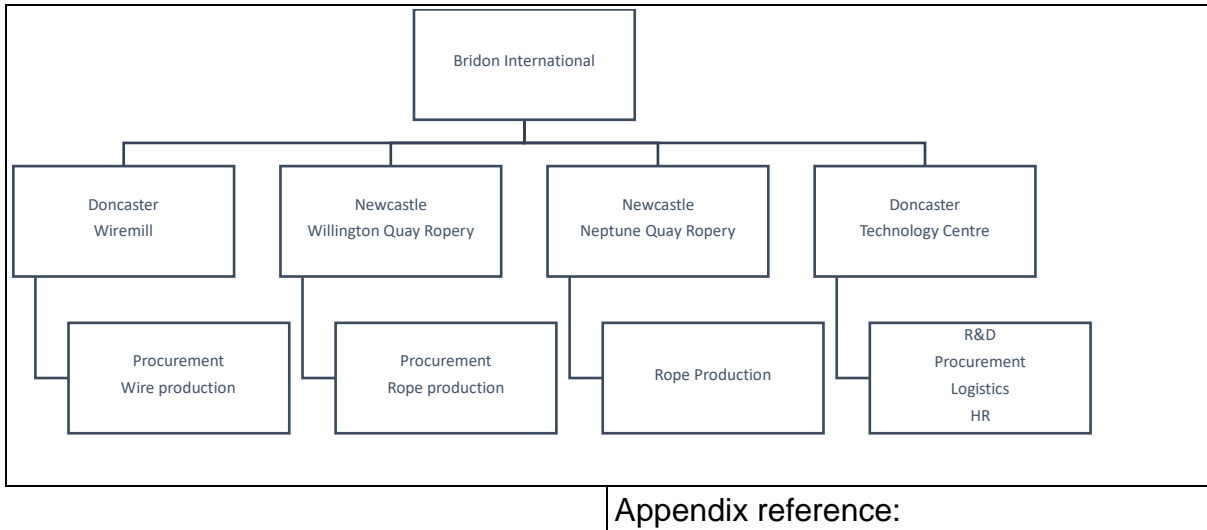
6. State whether your company is a member of any representative organisations (e.g., trade bodies, associations, Chambers of Commerce). If so, please provide a copy of the relevant documentation.

IMCA, LEEA,	
Appendix reference: LEEA 2023 IMCA Membership	

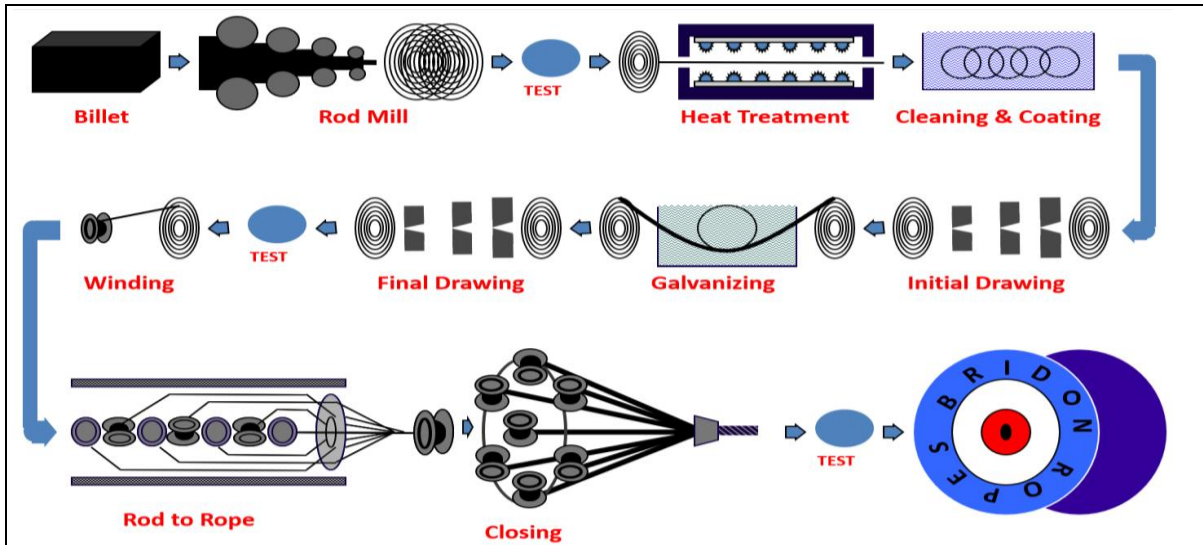
A3 Organisational structure

Please answer the questions below about the internal structure of your company and any associations with other companies. Both natural persons (individuals) or legal persons (e.g., companies) are associated where they meet the definition of ‘Related Persons’ in Regulation 128 of the *Customs (Import Duty) (EU Exit) Regulations 2018*.

1. Please explain, or demonstrate in a diagram, the legal structure of your company showing the internal hierarchical and organisational structure, all sites / locations and departments which are involved in the production, sales, R&D, supply and distribution of the like goods for domestic and export markets.



2. Please provide a written summary and a diagram / flow chart, if available, of your production process for the like goods that you produce in the UK. Clearly indicate the different production stages carried out by your company.



Purchased rod is subjected to heat treatment followed by chemical and mechanical cleaning in the Wiremill in Doncaster. The rod is then fed through the first drawing machine to reduce size; is then immersed (depending on product) in the galvanizing bath before being reduced to final size by further drawing. Following quality checks the wire is spooled onto bobbins and transported to the roperies in Newcastle. The wire is fed through various stranding machines (depending on size) followed by the final closing machine to create a rope.

Appendix reference:

- Please complete **Annex 1 – Associated companies** for your company’s worldwide corporate structure and affiliations.

A4 Understanding the UK market

- Please explain the end use of the goods subject to review and the like goods. If there are multiple uses for the like goods, list them and, where possible, estimate what proportion of your sales goes to each.

Oil & Gas (offshore cranes & well servicing) – 78%
Fishing/Trawling – 14%
Cranes & Industrial – 8%

Appendix reference:

- Who are the general users / consumers / customers within the UK market for the goods subject to review and the like goods?

As above

Appendix reference:

- Provide a general description of the nature of competition within the international and UK markets for the goods subject to review and the like goods.

Key competitors include from the US WireCo, Teufelberger from the EU as well as UK manufacturer Brunton Shaw. Key competing factors are price and quality.

Appendix reference:

4. How price-sensitive is demand for the goods subject to review and like goods?
 Very sensitive

Please provide a reason for your response.

After the escalating cost of raw materials and utility costs, there is a tight budgetary limit within large projects (in which our products are used); non-project based sales are to low margin industries (fishing & marine).

Appendix reference:

5. What do you consider to be the key factors that influence customer purchase decisions (e.g. price, quality, accessibility, manufacturing processes)?

Price, quality and leadtimes

Appendix reference:

6. To what extent is it feasible for producers of steel ropes and cables to change their level of production in response to changing market conditions such as increases in prices?

Ramping up is fairly quick as usually with spare capacity; ramping down the opposite as 75% of our costs are fixed.

Appendix reference:

7. Please provide a general description of the trends and drivers of demand within the UK market for the goods subject to review and the like goods, including causes of demand fluctuations and any factors contributing to overall market growth or decline.

Oil & Gas output and construction project fluctuations impact 94% of our business.

Appendix reference:

8. What are the primary distribution and marketing channels within the UK market for the goods subject to review and the like goods?

We sell directly to customers as well as through distributors and project sub-contractors.

Appendix reference:

9. Do the goods subject to review and like goods compete directly with one another?

Yes

Appendix reference:

10. Are there any goods which could be substituted for the goods subject to review and the like goods?

No, our products are specialised, heavy duty ropes

Appendix reference:

11. Provide a general description of any government regulations or tax incentives affecting the production or sale of the goods subject to review and the like goods.

R&D Tax credits

Appendix reference:

12. Provide a general description of developments in technology affecting the characteristics, demand or the production process of the goods subject to review and the like goods.

Metallurgical developments in materials used for improved performance and/or durability.

Appendix reference:

13. Provide a comment on any other factors which influence the market for the like goods and goods subject to review (e.g. seasonality).

Little seasonality, mostly project driven.

Appendix reference:

A5 Board members and principal shareholders

1. Please complete the table below for any shareholder with >5% holding in the company who also has interest in any organisation related to the production, marketing, administration, and sale of the like good in the UK, the People's Republic of China, Morocco, or the Republic of Korea.

Name	Shareholding in company	Name of Other Companies in which person holds interest	Activity of other companies
Bridon Holdings Limited	100%	Bridon Hangzhou Ropes Co Ltd	Sales of rope in PRC

+Add additional rows as required.

2. Please complete the table below for any members of the Board of Directors who also has interest in any organisation related to the production, marketing, administration and sale of the like good in the UK or the People's Republic of China, Morocco, or the Republic of Korea.

Name	Position on Board of Directors	Name of Other Companies in which person holds interest	Activity of other companies
n/a			

+Add additional rows as required.

A6 Operational links with other companies or persons

1. Please complete the table below if your company has established long term agreements or relationships with any company / companies located in the UK, the People's Republic of China, Morocco, Republic of Korea, or in third countries for the production (e.g., sub-contracting), supply and sale of the goods subject to

review or the like goods, or other licensing, technical patent or compensatory agreements. Please provide the relevant contract for each agreement listed.

Company name and address	Nature of agreement	Company registration number and place of registration	Appendix Number of contract
n/a			

+Add additional rows as required

A7 Accounting practices

1. Give the address where your company's accounting records are kept and can be verified by the TRA. If records are maintained in different locations, please indicate which records are kept at which location. If records are digital and do not have a physical location, please mark as N/A.

Records address	What records are held?
Technology Centre, Balby Carr Bank, Doncaster DN4 8DG	Accounting records

+Add additional rows as required

2. Please give the financial year convention your company uses for its accounts (e.g., 1 January – 31 December). If any changes have occurred with respect to this period or in your accounting practices over the last four financial years, please describe these changes.

1 January – 31 December

Appendix reference:

3. At what point are sales revenues, and purchase costs recognised in your systems? Please ensure your revenue and cost figures are applied to the POI and the IP as per your revenue / cost recognition methodology.

When Inco terms have been fulfilled.

Appendix reference:

4. For your company and any associated parties involved in the production, marketing or sales of your goods, please attach a copy of your annual reports, including the financial statements and audit report(s) covering the injury period.

2022 accounts are publicly available on 30 September 2023 and therefore unable to release any data on a non-confidential basis.

5. If your accounts are unaudited, please attach a copy of your unaudited financial statements for the injury period from 1 January 2019 to 31 December 2022.

As above

Appendix reference:

6. Please attach a copy of your company's trial balance (in original and spreadsheet form) covering the POI, 1 January 2022 to 31 December 2022. If your financial year is fully aligned with the POI, this is all that is required.

Where your financial period is not aligned with the POI, please provide trial balances (in original and spreadsheet form) to cover the following periods:

- The trial balance starting from the first day of the financial year and ending on 31 December 2021;
- The trial balance which starts from 1 January 2022 to the end of the next financial year; and
- The trial balance starting from the beginning of the following financial year and ends on 31 December 2022.

As accounts are not publicly available until 30 September 2023 (as above), unable to provide any financial data on a non-confidential basis.

7. For your company and any associated parties involved in the production, marketing or sales of the like goods, please attach copies of relevant management accounts (e.g., profit and loss statement) for the profit centre that

includes the like goods. Please provide these reports for the (i) POI and (ii) most recently completed financial year.

As above, unable to provide until 30 September 2023.

8. If your company is part of a group of companies, please also attach a copy of the consolidated accounts of the group for your most recently completed financial year.

Only have permission to share publicly available results from investors communications.

Appendix reference: Bekaert 2022 published results

9. Please provide a detailed description of your financial accounting system, explaining how sub-ledgers (e.g., costing, debtors, creditors) and other sales or production systems integrate with the general ledger. Please provide a description of how it links to the management accounting system, including any manual interventions. Please also attach:

- your company's chart of accounts;
- your company's cost centres.

Our financial accounting system is SAP, wholly integrating gl, debtors and creditors. Data from our production & costing system (Avalon) is uploaded via interface.

Appendix reference: COA

10. Have you changed your financial policies during the injury period? If so, please explain the changes, including dates and the reasons for those changes along with the financial impact of those changes against the like goods.

No

Appendix reference:

SECTION B: About your goods

B1 Understanding your like goods

The goods subject to review in this review are defined in [‘the scope of this review’](#).

1. Please complete **Annex 2 – Product comparison**. If your company manufactures a range of like goods, list this information for each individual make and model in the range.
2. Please explain how your internal product coding system works. Where possible, please provide a guide to understanding the product codes that you have listed in **Annex 2**.

Please refer to Appendix “Ropes Product Structure_Non conf”

Appendix reference: Ropes Product Structure_Non conf
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3. If there are differences in characteristics within your range of like goods which cause distinguishable differences in price, explain those differences and the effect they have. Attach any evidence you have that is relevant. This could take the form of sales brochures, input costs, research papers or any other relevant documentation.

n/a

Appendix reference:

4. Indicate in the box below any physical, commercial or functional differences between your products and the goods subject to review. If these differences cause distinguishable variations in price, explain those differences and the effect they have. Attach any evidence you have that is relevant.

n/a

Appendix reference:

5. Please provide details of your like goods regarding their production processes, interchangeability, raw materials used, degree of model differentiation, channels of distribution and sale, pricing and other relevant characteristics.

Production process – please refer to section A3.2

Our ropes are made of strands of wire that are mostly produced in our Doncaster Wiremill, from purchased steel rod and various coating materials. The wires are transported to our Newcastle factory where they are stranded and finally closed into various sizes of ropes. Depending on the requirements, some ropes are finished off in our service centre with various fittings.

Most of our like goods are sold directly to customers or project management outfits.

Appendix reference:

SECTION C: Costs and Production

C1 Cost to make and sell

1. Please complete **Annex 3 – Cost to make and sell** for your total goods and for the total like goods produced in the POI.
2. If your company is vertically integrated or some of the inputs (e.g., raw materials, energy) used in the production of your like goods are produced by an associated party, provide details of this arrangement, and attach documentation demonstrating any agreements you have.

n/a

Appendix reference:

3. Please state the cost allocation method for each cost type listed in **Annex 3 – Cost to make and sell**.

Costs are directly allocated to relevant profit centres.

Appendix reference:

C2 Cost and sales reconciliation

1. Please complete **Annex 4 – Cost reconciliation**: please only fill in the white cells and include reference to the source documents of the inserted data.

C3 Production process

1. Please provide a written summary and a diagram / flow of your production process clearly indicating the different production stages for your like goods carried out by your company.

Please refer to section A3.2

Appendix reference:

- Identify what parts of your production process take place in the UK and explain at what stage the most value is added to your like goods in the production process. Please describe the manufacturing process of the like goods, its level of complexity and the investment of capital involved. If a production process is carried out outside the UK, please explain the nature of the activity and where this process step takes place.

All our production takes place in the UK, for detailed description of the process please refer to section A3.2.
It is during the rope making process that the most value is added.
On average, we invest cca £3m per annum on the update of our capital equipment that is currently valued at £42m.

Appendix reference:

- Please provide the physical addresses (including town / city and county) of all your company's UK sites / facilities involved in the production of the like goods.

Company name	Physical address
Bridon International Ltd	Doncaster, Yorkshire
Bridon International Ltd	Newcastle-upon-Tyne

Appendix reference:

+Add additional rows as required

C4 Raw material (RM) and major input purchases

- Please complete **Annex 5 – Raw materials and inputs**, detailing by supplier, purchases, which account for more than 5% of total cost to make and sell (or if energy more than 1%), used in the production of the like goods during the POI by your company.
- Please provide an invoice and any supporting documents for two of your suppliers stated within **Annex 5 – Raw materials and inputs**. Use the box below to give an overview of any supporting documents provided.

September 2022 invoices for British Steel and Boliden.
Please note Annex 5 is based on full year average prices.

Appendix reference:
Invoice_BS
Invoice_Boliden

C5 Purchases of like goods and / or goods subject to review

1. Complete **Annex 6 – Purchases of like goods** and / or goods subject to review
This should include information relating to your company's total annual purchases of the like goods and / or goods subject to review over the injury period. All figures should be reported net of recoverable tax. Please list for each year every country you have purchased from in a separate row.
2. Describe how these purchases fit into your business model. Please attach copies of any agreements or contracts that you have relating to your purchases of like goods and / or goods subject to review.

We buy certain diameter products that are uneconomical to be manufactured within our factory from a group company Indonesia. No contract exists, purchases are made based POs.

Appendix reference:

SECTION D: Sales

D1 Domestic sales

1. Complete **Annex 7 – Transaction by transaction (T by T) domestic sales**

- This should include all your domestic sales net of returns for the like goods for the POI. Include the like goods you have produced, purchased and resold and / or goods subject to review that you have purchased and resold.
- Please report returns as negative (-) sales figures.
- Please ensure that you correctly categorise each sale by PCN.
- For transactions or invoices that consist of multiple PCNs, the same invoice number should be referenced.

Please contact the case team if you can't provide the relevant information in sufficient detail.

D2 Sales reconciliation

1. Please complete the sales reconciliation table in **Annex 8 – Sales reconciliation**.
2. Additionally, please complete the sales forecast table in **Annex 8 – Sales reconciliation** providing quantitative estimates (e.g., projections or forecasts) for the sales revenue and quantity of like goods and of all other goods you produce on the UK market for the next five years.

D3 Distribution channels and price setting

1. If applicable, please provide copies of price lists for the like goods sold during the POI.

n/a – the large majority of our ropes are made to order

Appendix reference:

2. If any price reductions have been applied to any of your sales of like goods over the POI, please provide a description. This includes discounts, rebates, credit terms, allowances and commissions.

- Explain the terms and conditions that must be met for any price reduction.
- Indicate any price reduction not included in an invoice price. Explain how the invoice price and the price reduction have been calculated.

No price reductions have been applied. We do pay commission to agents representing us outside of the UK, based on contractual agreements tied to turnover.

Appendix reference:

3. Please provide details of any distribution networks for your like goods.

Our products are mostly sold directly to customers, with the exception of a handful distributors representing us outside of the UK.

Appendix reference:

4. Do your sales usually include delivery in the price? If so, please explain how you calculate delivery costs and prices?

Yes, it does. Delivery costs are based on advance quotations from carriers and passed onto the customer mostly at cost.

Appendix reference:

5. Does delivery price vary between customers? If this is the case, then please explain what these differences may relate to.

It will depend of destination, mode of transport as well as dimensions of product.

Appendix reference:

6. Attach sales contracts for the top five customers by volume in **Annex 7 – Transaction by transaction (T by T) domestic sales** that you have sold like goods to in the period of investigation.

n/a - sales are made based on individual POs.

Appendix reference:

7. Select examples of domestic sales of like goods to three different customers included in **Annex 7 – Transaction by transaction (T by T) domestic sales**. Attach as an appendix a complete set of documentation for these sales. Where possible, include purchase orders, commercial invoices, order acceptances, discounts or rebates, credit and debit notes, contracts of sale, freight and insurance details, bank documentation and all other relevant documents.

Please answer here

3 invoices attached

Appendix reference:
Cust Invoice_Certex
Cust Invoice_Diamond
Cust Invoice_Jackson

D5 Captive use

1. For products classified for internal use in **Annex 2- Product Comparison** please specify how these goods were used.

Please answer here

Some are used for testing and research & development. Others are sold on to group companies for onward customer sales.

Appendix reference:

2. Please comment on whether your internal use of the like good would be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please attach evidence to support your answer where possible.

Please answer here

We would not be able to compete and would ultimately end up ceasing supply.

Appendix reference:

SECTION E: Injury to your company

Injury could be caused to UK industry as a result of dumped imports.

This could come in the form of:

- material injury to UK industry;
- threat of material injury to UK industry; or
- material retardation of the establishment of such an industry.

You can refer to our [guidance on how we assess injury](#) for additional detail.

1. Would your company suffer from injury if the existing anti-dumping measure on the goods subject to review no longer applied? If so, please describe the nature and degree of the injury. If your company is already suffering injury, would the nature or source of the injury change if the measure was to no longer apply?

We are already losing sales in certain markets outside of the UK without the anti-dumping measures in place. If they would no longer be applied here, we would see a rapid deterioration in our sales.

Appendix reference:

2. How would your costs to make and sell change if the existing anti-dumping measure on the goods subject to review no longer applied? What measures would your company have to take to remain competitive? If possible, please provide annual estimates (e.g., projections or forecasts) for the next five years for any changes and use the text box below to explain the methods used to calculate these estimates.

It is likely that we would have to reduce our prices below cost, a situation that would be impossible to sustain.

Appendix reference:

3. Please complete **Annex 9 – Injury**. This should be completed in reference to your UK production of the like goods for the injury period.
4. Please explain how you calculated and apportioned your average net operating profit after tax (NOPAT) for the like goods.

It has been apportioned based on volume

Appendix reference:

5. Please explain how you assess your stock levels. Please indicate if your stock levels were abnormally high during the injury period. If so, please explain.

Our average raw material stock is 2 – 3 weeks. Finished goods will largely depend on customer collections.
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Appendix reference:

6. Please explain how you estimated your percentage of market share for the like goods.

We do not have this data available to us.

Appendix reference:

7. Please explain how you calculated your production capacity and capacity utilisation for the like goods, and the cause of any significant variations.

Based on full machine occupancy, 3 shifts per machine, 5 days per week.

Appendix reference:

8. Explain any variances between your actual and forecasted budgets over the injury period, with reference to your cash flow statements. Would your forecasted budgets be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Our forecasted budgets would rapidly (cca 30%) decline, based on our experience in markets outside of the UK. This would be due to our pricing, which reflects the cost of domestic production, becoming uncompetitive vs influx of cheap imports.
--

Appendix reference:

9. Please explain how you set your wages, and the causes of any significant variations.

Wages are set according to the internal remuneration matrix, on occasion adjusted for market trends.
--

Appendix reference:

10. Please explain whether any of the indicators listed in **Annex 9 – Injury** would be affected if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence. Where possible, please add additional rows in **Annex 9 – Injury** to provide estimates for the next five years (e.g., projections of forecasts). Please use the text box below to explain the methods used to calculate your estimates.

Yes, our production output would decline in line with sales. Our headcount would have to be reduced as part of the necessary further rationalisation, as it happened in 2020 and 2021.

Appendix reference:

11. For your like goods only, please state what level of profit, before tax and as a percentage of turnover, your company would expect to achieve in the absence of injury and explain how you arrived at this figure. Would your level of profit, before tax, as a percentage of turnover for the like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

As we are highly likely would have to resort to lowering prices below cost, we would expect to make a loss (negative margin) of between 5-10%.

Appendix reference:

12. Explain how you set your current sales price for your like goods. Is this the same as your target sales price? If not, please explain the reasons for this. Would your sales price for your like goods be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Our pricing is based on a cost plus basis. Without the anti-dumping measures in place, this would drop to cost minus.

Appendix reference:

13. Complete **Annex 10 – Investments and Return on Investment**.

- For each investment category, indicate the amount of investment (apportioned, where applicable) and explain what the investment is for.
- Please provide an appendix showing the figures you used in calculating the ROI.
- Where possible, add columns in **Annex 10 – Investments and Return on Investments** to provide estimates (e.g., projections or forecasts) for future years assuming the measure is retained.
- For the investments you have made during the injury period, please also provide the depreciation incurred company-wide and for the like goods.

Please refer to Annex 10.

Appendix reference:

14. Please provide details of your typical source(s) of finance (e.g., loans, debt, share issues, bond issues) for each category of investment relating to your company-wide investments.

Our investments are financed with our parent company cash facility.

Appendix reference:

15. Please describe any changes in your company's level and trends of returns on investment over the injury period. Please explain the nature and cause of this change and substantiate with supporting evidence (e.g., funding proposals, loan approvals or other relevant financial documents).

n/a

Appendix reference:

16. Please explain whether your company's ability to make investments and / or ability to raise capital would be affected in the next five years if the existing anti-dumping measure on the goods subject to review no longer applied. Please substantiate your claims with evidence (e.g., company investment plans, funding proposals, financial forecasts) and if you have provided estimates explain how you calculated them.

Our parent company would be likely to wind up the business, following year of investment with negative return.

Appendix reference:

17. Please complete **Annex 11 – Forward sales contracts**. Describe and attach copies of all forward sales contracts / ongoing supply agreements for the like goods. Comment on these forward sales contracts – are they a usual way of doing business in your industry? Has there been any variation in the volume and value of forward contracts over time? If so, what has caused this variation? Would your forward sales contracts be affected if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Annex 11 is populated with our closing orderbook as at 31 December 2022, the usual commitment to do business. Loss of the anti-dumping measures would mean a significant reduction in the order book.

Appendix reference:

18. If your company is currently suffering from injury, please explain and indicate the degree to which this has been caused by the alleged dumping of the goods subject to review. Please also explain and indicate the degree to which any other factors might have caused the injury, for example:

- volume and prices of imports not sold at dumped prices
- contraction in demand or changes in patterns of consumption
- restrictive trade practices of, and competition between, third country and UK producers
- developments in technology; and
- export performance and the productivity of the UK.

Please substantiate your claim(s) with evidence.

Would the cause(s) or degree of injury change if the existing anti-dumping measure on the goods subject to review no longer applied? Please describe the nature of any change and substantiate your claims with evidence.

Our ability to win export orders have been significantly been reduced in the past 12 months by aggressive undercutting in markets outside the UK without anti-dumping measures in place as domestic energy and raw material costs pushed our prices up. As the UK market has been benefitting from anti-dumping measures, we suffered minimal injury for like goods in the UK. However, our wire sales have drastically (75%) decreased in the same period due to the influx of cheap imports.

Appendix reference:

19. Would there be any other effects on your industry and / or company if the existing anti-dumping measure on the goods subject to review no longer applied? Please substantiate your claims with evidence.

Our reduction in output would also have a negative impact on our domestic supplier and ancillary service providers, not to mention our staff through redundancies. Ultimately the technical know-how would be lost of a skilled labour force.

Appendix reference:

SECTION F: Dumping

Please note that all questions in this section are optional. If you choose not to provide information to a question in this section, please state this or write 'N/A' in the respective text box.

F1 Dumping

1. Do you have any information about the normal value or domestic sales prices of the goods subject to review in the People's Republic of China, Morocco, or the Republic of Korea? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes, market intelligence or sales correspondence, or any other documentation relating to the domestic price of the goods subject to review in the People's Republic of China.

Please refer to the UK Steel submission.

Appendix reference:

2. Do you have any information about the export price to the UK of the goods subject to review from the People's Republic of China, Morocco, or the Republic of Korea? Please substantiate with evidence where possible. This may include sales catalogues, price lists, invoices, quotes or sales correspondence, or any other relevant documentation relating to the export price to the UK of the goods subject to review from the People's Republic of China, Morocco, or the Republic of Korea.

Please refer to the UK Steel submission.

Appendix reference:

F2 Likelihood of dumping

1. Do you have any information about the capacity and capacity utilisation among exporters of the goods subject to review during the POI? Please provide estimates and substantiate with evidence where possible.

Please refer to the UK Steel submission.

Appendix reference:

2. Do you know how capacity and capacity utilisation among exporters of the goods subject to review have changed during the POI, or might change in the next five years? Please provide evidence if available.

Please refer to the UK Steel submission.

Appendix reference:

3. Please provide any additional information that might inform our assessment of whether imports of the goods subject to review are likely to be dumped if the measure is removed. This could include:

- exports of like goods to third countries by exporters of the goods subject to review,
- whether exporters of the goods subject to review have previously circumvented or absorbed the effects of trade remedy measures,
- conditions for the exporters of the goods subject to review in their domestic market,
- inventory or stock level, of the goods subject to review or inputs to them,
- information on raw material markets and prices, including any restrictions concerning raw materials used to produce the goods subject to review,
- attractiveness of the UK market for steel ropes and cables compared to the market in third countries, and
- any other relevant factor.

Please provide supporting evidence where possible.

Please refer to the UK Steel submission.

Appendix reference:

F3 Specificities regarding the exporting country

1. If you are aware of any factors that could mean costs or profits of the goods subject to review are not substantially determined by market forces, please provide details and any supporting evidence.

Please refer to the UK Steel submission.

Appendix reference:

SECTION G: Economic Interest

G1 Economic interest

The economic interest test helps the TRA assess the economic impact of a measure compared to what would happen if it no longer applied. There are six factors which the TRA must consider as part of the economic interest test:

- i) The injury caused by the dumped goods to UK industry and the benefits to that industry in removing the injury.
- ii) The economic significance of affected industries and consumers in the UK.
- iii) The likely impact on affected industries and consumers in the UK.
- iv) The likely impact on particular geographic areas, or particular groups, in the UK.
- v) The likely consequences for the competitive environment and for the structure of markets for goods in the UK.
- vi) Other matters that the TRA consider relevant.

The questions in this section will contribute to this assessment. Please provide information broken down by each of your company's UK sites / facilities, where relevant and possible.

G2 Background

1. Please provide any known names, legal addresses and telephone numbers of the following domestic companies:

- Those that produce steel ropes and cables in the UK;
- Those that are involved in the importation, distribution, or sale of steel ropes and cables from third countries.

Brunton Shaw UK - Sandy Lane, Worksop S80 3ES – Tel 01909 537600
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Appendix reference:

2. Please provide an overview of your upstream supply chain for steel ropes and cables (e.g. producers of raw materials). Where possible, please describe the number, location, and size of UK producers at each stage.

British Steel (Scunthorpe) is our largest UK supplier. Our freight forwarder is Swains of Manchester.

Appendix reference:

3. Please provide an overview of your downstream supply chain. Please indicate who the consumers of steel ropes and cables are, which industry and level of

trade they relate to and whether they are companies or private individuals. Are steel ropes and cables considered to be an intermediate and / or final good?

Please refer to section 4 of this questionnaire. Steel ropes are a mostly considered as final goods or components.

Appendix reference:

4. We have observed an increase in the volume of imports of steel ropes and cables from People's Republic of China between 2019 and 2022. Where possible, please explain why this may have occurred and substantiate your claims with evidence.

The manufacturers of the PRC are highly likely to have launched into an aggressive market share buy-up, in anticipation of the safeguards coming to an end. Temporary loss leading sales to eliminate competition is a frequently used tactic for market entry.

Appendix reference:

G3 Your company

1. Please complete **Annex 12 – Economic Interest Test**, providing employment figures in full-time equivalents (FTE) for each of your company's UK sites or facilities.
2. How would these employment figures be affected if the existing anti-dumping measure was to no longer apply? Please substantiate your claims with evidence.

Significant redundancies would have to be made as part of further rationalisation, to the point of closure in extreme circumstances.

Appendix reference:

3. How would your domestic sales of steel ropes and cables be affected if the existing anti-dumping measure was to no longer apply? Please substantiate your claims with evidence.

Please refer to previous section.

Appendix reference:

4. How significant is the production of steel ropes and cables relative to your company's entire UK production?

It is currently 75% of our business.

Appendix reference:

G4 Potential impacts of a measure

1. Please describe how you would expect a decrease in the import prices of steel ropes and cables to affect each of the following. Where possible, please support your claims with evidence:

- Domestic prices of steel ropes and cables;

Increase as reduced production and sales would increase overall cost / tonne and due to the price mechanism, this would in turn be passed on to customers (with all other things being equal).

Appendix reference:

- Total UK production of steel ropes and cables;

Would increase in line with sales.

Appendix reference:

- total imports of steel ropes and cables from the People's Republic of China, Morocco, or the Republic of Korea, other third countries to the UK; and

Would decrease without the unfair price advantage.

Appendix reference:

- total exports of steel ropes and cables from the UK.

Increase as increased production and sales would reduce overall cost / tonne and due to the price mechanism, this would in turn be passed on to customers (with all other things being equal), making us more competitive outside the UK.

Appendix reference:

2. Do you know of any related industries that would be affected if the existing anti-dumping measure on steel ropes and cables was to no longer apply?

Please consider in particular:

- upstream industries – those who produce inputs (such as raw materials) needed for steel ropes and cables;

Rod manufacturers

Appendix reference:

- downstream industries – those who purchase steel ropes and cables;

Oil&Gas, construction and fishing industries.

Appendix reference:

- industries for complimentary goods – those which would typically be bought alongside steel ropes and cables(if any); and

n/a

Appendix reference:

- industries for substitute goods – those which might be bought instead of steel ropes and cables (if any).

n/a

Appendix reference:

3. To what extent would you expect any changes in prices for steel ropes and cables to be passed onto final consumers?

Increased production and sales would reduce overall cost / tonne and due to the price mechanism, this would in turn be passed on to customers (with all other things being equal).

Appendix reference:

4. Would your plans for investment or expansion in the UK over the next five years be affected if the existing anti-dumping measure was to no longer apply? Please support your claims with evidence, where possible.

As before, our parent company would be likely to cease investment without any foreseeable return.

Appendix reference:

5. As a public body, the TRA has an obligation under the *Equality Act 2010* to ensure that the possible effects of its activities on different people are considered. This public sector Equality Duty covers the following protected characteristics:

- age,
- disability,
- gender reassignment,
- marriage or civil partnership,
- pregnancy and maternity,
- race,
- religion or belief,
- sex, and
- sexual orientation.

Please provide any relevant information about whether the existing anti-dumping measure might disproportionately affect any of these groups or any other particular group.

n/a

Appendix reference:

6. How would the number or range of suppliers in the Steel Ropes and Cables market be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

It would reduce with most suppliers going out of business with the expected drop in demand.

Appendix reference:

7. How would the suppliers' ability to differentiate their products by price, quality, service or innovation in the Steel Ropes and Cables market be affected if the existing anti-dumping measure was to no longer apply? Please provide an explanation.

It would be impossible to compete with the unfair price advantage. Quality and innovation advantages are very narrow in the steel ropes market, there is little leverage to be had.

Appendix reference:

8. How would the cost of switching between suppliers in the Steel Ropes and Cables market be affected if the existing anti-dumping measure is to no longer apply? Please provide an explanation.

This would be not impacted as the products are similar in specification and function.

Appendix reference:

9. How would the suppliers' ability to set agreed prices between themselves or for certain consumers or products be affected if the existing anti-dumping measure is to no longer apply? Please provide an explanation.

Suppliers would be forced to price below cost of production.

Appendix reference:

10. How would the choices of Steel Ropes and Cables available to consumers be affected if the existing anti-dumping measure is to no longer apply? Please provide an explanation.

With the ultimate closure of some businesses, some speciality ropes would disappear from the market, alongside with the technical know-how. These include for example triangular ropes (although not in scope of this review).

Appendix reference:

11. How would the ability of downstream businesses or consumers to make informed decisions be affected if the existing anti-dumping measure is to no longer apply? Please provide an explanation.

It would be largely unaffected.

Appendix reference:

12. Are there any additional economic factors that you consider to be relevant for the economic interest test in this review?

We are currently transferring production from our German factory to Newcastle, creating additional UK jobs and investing GBP7m in our manufacturing facilities. If dumping affected the rope markets to the same extent as it did the wire one (-80% volume decline in last 3 years), we would not be able to maintain an efficient model and would be forced to close our plants.

Appendix reference:

SECTION H:

Checklist and appendices

This section is an aid to ensure that you have completed all sections of this questionnaire.

Section	Please tick if you have responded to all questions
Section A – Company structure and operations	Yes
Section B – About your goods	Yes
Section C – Costs and production	Yes
Section D - Sales	Yes
Section E – Injury to your company	Yes
Section F – Dumping	Yes
Section G – Economic Interest	Yes

+Add additional rows as required

Please list any appendices that you have referenced in your responses and are attaching with this questionnaire.

Appendix reference	Document title
COA	COA
Bekaert 2022 published results	Bekaert 2022 published results
Cust Invoice_Certex	Cust Invoice_Certex_NonConf
Cust Invoice_Certex	Cust Invoice_Certex_NonConf
Cust Invoice_Diamond	Cust Invoice_Diamond_NonConf
Cust Invoice_Jackson	Cust Invoice_Jackson_NonConf
Invoice_Boliden	Invoice_Boliden_NonConf
Invoice_BS	Invoice_BS_NonConf
Rope Product Structure	Rope Product Structure
LEEA 2023	LEEA 2023_NonConf
IMCA Membership	IMCA Membership_NonConf
TD0034 Domestic Producer Questionnaire	TD0034 Domestic Producer Questionnaire_v3 NonConf

+Add additional rows as required

